UNITED STATES PATENT AND TRADEMARK OFFICE

BEFORE THE PATENT TRIAL AND APPEAL BOARD

GOOGLE LLC, Petitioner,

v.

LS CLOUD STORAGE TECHNOLOGIES LLC, Patent Owner.

Patent 10,154,092

PATENT OWNER'S PRELIMINARY RESPONSE TO PETITION FOR INTER PARTES REVIEW



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III. THE ASSERTED PRIOR ART	6
A. Heil (EX1006)	65
B. Nakayama (EX1007)	
C. Gulick (EX1008)	1.0
D. Berman (EXH1009)	10 11
V. THE PETITION FAILS TO DEMONSTRATE THE CHALLEN	
CLAIMS ARE UNPATENTABLE CLAIMS ARE UNPATENTABLE	
VA. The PetitionPetitioner Fails to Demonstrate That There Is a Reas	
Likelihood Establish in Ground 1 that Challenged Claims 1-3,	
That Any Challenged Claim is Unpatentable	
7-12, and 19-23 are Anticipated by Heil under 35 U.S.C. § 102(e)	
1. Claim 1	
2. Claims 2-3 and 7-12	<u> 1819</u>
3. Claim 19	<u> 1819</u>
34. Claims 20-23	
B. Petitioner Fails to Establish in Ground 2 that Challenged Claims 1	0 and
11 are Anticipated by Heil under 35 U.S.C. § 102(b)	
C. Petitioner Fails to Establish in Ground 3 that Challenged Claims 1-	
6-24 are Obvious over Heil and Nakayama under 35 U.S.C. § 1030 1. Claim 1	(a)20 2(
1. Claim 1 2. Claims 2-3 and 6-12	20 <mark>2</mark> 1
2 (1) 12	2021
4. Claims 14-18	2122
5. Claim 19	21 <mark>22</mark>
6. Claims 20-23	23
7. Claim 24	23



D. Petitioner Fails to Establish in	Ground 4 that Challenged Claim 4 is
Obvious over Heil, Nakayama	a, and Gulick under 35 U.S.C. § 103(a) <mark>24-<u>25</u></mark>
E. Petitioner Fails to Establish in C	Ground 5 that Challenged Claim 5
Obvious over Heil, Nakayama,	and Berman under 35 U.S.C. § 103(a) <u>2425</u>
A. CONCLUS	$\frac{25}{26}$



TABLE OF AUTHORITIES

Cases	
In re Zletz, 893 F.2d 319, 321, 13USPQ2d 1320, 1322 (Fed. Cir. 1989)	5
Chef America, Inc. v. Lamb-Weston, Inc., 358 F.3d 1371, 1372, 69 USPQ2d 18	857
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Graham v. John Deere Co., 383 U.S. 1, 17–18 (1966)	11
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35 U.S.C. 282(b)	4
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EXHIBIT LIST

Exhibit	Exhibit Title
1001	ReedGertner (U.S. Pat. No. 10,154,092)
1006	Heil (U.S. Pat. No. 6,173,374)
1007	Nakayama (U.S. Pat. No. 5,920,893)
1008	Gulick (U.S. Pat. No. 5,692,211)
1009	Berman (U.S. Pat. No. 6,118,776)
2001	Declaration of Dr. Hassan Zeino, Ph.D.



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